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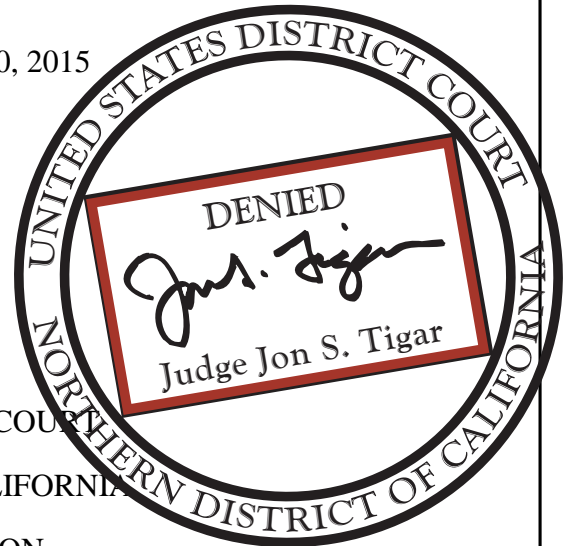
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Dated: February 10, 2015

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION



UNITED STATES OF AMERICA,)	CASE NO. 13-CR-93 JST
)	
)	STIPULATION AND PROPOSED ORDER TO
)	CONTINUE THE FEBRUARY 13, 2015 STATUS
v.)	CONFERENCE DATE
)	
JONATHAN MOTA)	
)	
Defendant)	

The parties appeared before the Honorable Jon S. Tigar on October 29, 2014 for a hearing on severance and 404(b) motions. Time under the Speedy Trial Act has been excluded until April 13, 2015, and the Court has ordered the parties to submit a revised pretrial and trial schedule within 7 days after the Court issues its decisions on the severance and 404(b) motions.¹ To date, those decisions remain outstanding. Recently, a Clerk's Notice set a status hearing for this Friday, February 13, 2015. The parties jointly request that this status hearing be vacated and continued until a later date for the

¹ The parties are collectively of the view that the Court has already vacated the previous pretrial and trial date that were predicated on an April 13, 2015 trial date. Neither party proposes to go forward on the original pretrial or trial schedule that pegged April 13, 2015 as a trial date.

1 following reasons. For one thing, the main issue that remains outstanding is a pretrial and trial schedule,
 2 and the parties believe they need the Court's ruling on the outstanding motions in order to meaningfully
 3 develop a proposed schedule. There are no other significant status developments to report to the Court.
 4 In addition, government counsel both have conflicts with the February 13, 2015, status hearing in
 5 Oakland. Government counsel brought this to the attention of the Court's courtroom deputy upon seeing
 6 the Clerk's Notice setting the February 13, 2015 date and the courtroom deputy replied that it was likely
 7 the date would be vacated closer to the actual hearing date but that a date was needed to keep the case on
 8 the Court's calendar. Standby Counsel for Defendant Mota has discussed this stipulation with Mr. Mota
 9 and represents Mr. Mota agrees to the continuance of the status conference date and the trial date.
 10 Accordingly, and time having already been excluded until April 13, 2015, the parties jointly request the
 11 Court continue the status hearing until a date after the Court releases its rulings on the outstanding
 12 motions. Counsel for both parties respectfully request that the Court set a hearing on a date that the
 13 Court will be sitting in San Francisco, which the parties understand occurs one Friday per month.

14 Respectfully submitted

15 So stipulated

16 2/9/15

_____/s/_____
 KATHRYN HAUN
 Assistant U.S. Attorney

18 So stipulated

19 2/9/15

_____/s/_____
 RICHARD MAZER ESQ.
 Standby Counsel for Defendant Pro Se Mota

PROPOSED ORDER

For the reasons contained in the instant stipulated, IT IS SO ORDERED that the February 13, 2015 date is continued until _____ for the reasons stated in the parties' stipulation.

DATED: _____

JON S. TIGAR
United States District Court Judge